

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Adekunle Kuku,

Plaintiff,

v.

Capella University, Capella Education
Company and Capella University, Inc.,

Defendants.

Court File No.: 23-cv-3591 (PJS/DJF)

**DECLARATION OF PETER
HENNIGAN IN SUPPORT OF
CAPELLA'S MEET AND CONFER
STATEMENT**

STATE OF MINNESOTA)
) ss
COUNTY OF HENNEPIN)

I, Peter C. Hennigan declare under penalty of perjury, that:

1. On July 1, 2024, I attempted to meet and confer with Plaintiff Adekunle Kuku (hereinafter “Mr. Kuku”) regarding his motion to amend his complaint on behalf of Defendants Capella University, Capella Education Company and Capella University, Inc. (collectively “Capella”) by sending him an email.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the email I sent on behalf of Capella to Mr. Kuku on July 1, 2024 at 5:22 p.m. regarding a joint meet and confer statement on his motion to amend his complaint.

I declare under penalty of perjury that everything I have stated in this document is true and correct to my best knowledge, information and belief.

Dated: July 2, 2024

s/Peter C. Hennigan
Peter C. Hennigan

From: Peter Hennigan
Sent: Monday, July 1, 2024 5:22 PM
To: 'Adekunle Kuku'
Subject: FW: Request for Jt. Meet & Confer Statement - Kuku v. Capella University et al - 0:23-cv-03591-PJS-DJF

Dear Mr. Kuku,

The Court has requested that the parties file a joint meet and confer statement regarding your proposed Amended Complaint by no later than close of business, Tuesday, July 2, 2024 (see email below). Although you have not requested a meet and confer on your proposed Amended Complaint, by means of this email, I am informing you that Capella does not oppose your Amended Complaint. Once the Court has granted your Motion to File Amended Complaint, Capella will move forward with a Motion to Dismiss the Amended Complaint.

You have my permission to file this email communication with the Court as a "joint meet and confer statement." Please do so by tomorrow.

Best regards,
Peter Hennigan

PETER HENNIGAN

COUNSEL

612.672.8310 maslon.com

From: MND Foster Chambers <foster_chambers@mnd.uscourts.gov>
Sent: Monday, July 1, 2024 2:27 PM
To: Peter Hennigan <Peter.Hennigan@maslon.com>; Anna Barton <Anna.Barton@maslon.com>
Subject: Request for Jt. Meet & Confer Statement - Kuku v. Capella University et al - 0:23-cv-03591-PJS-DJF

Good afternoon,

The Court ordered the parties to meet and confer and file a joint meet and confer statement no later than **June 28, 2024**. The Court has not seen a joint meet and confer statement on the docket. Please file the statement as soon as possible, but no later than the **close of business tomorrow, July 2, 2024**.

06/24/2024	view 57	(Text-Only) Order: The Court construes the attachment to Plaintiff's Memorandum in Support of his Motion to File Amended Complaint (ECF No. 52 at 4-13) as Plaintiff's proposed Amended Complaint. Plaintiff's meet and confer statement (ECF No. 54) does not indicate Defendants' position. The Court directs the parties to meet and confer and file a <u>joint</u> meet and confer statement on or before June 28, 2024 indicating whether Defendants objects to Plaintiff's motion. Ordered by Magistrate Judge Dulce J. Foster on 6/24/2024. (JC) (Entered: 06/24/2024)
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Thank you!

Chambers of U.S. Magistrate Judge Dulce J. Foster
U.S. District Court | District of Minnesota